

## REMARKS

Claims 1-13 are pending in this application. Claims 1, 2, 5, 6, and 8 have been amended. Claims 12 and 13 have been added. No new matter has been introduced through these amendments.

### Claim Rejections Under 35 U.S.C. § 102(e)

Claims 1 and 3-4 are rejected under U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,244,811 to Takano. Applicants respectfully traverse these rejections in light of the amendments to independent claim 1. In particular, Takano fails to teach a top and bottom substrate support configured to each support a single semiconductor substrate within the chamber, the top substrate support configured to receive a first substrate from one of the modules, the bottom substrate support configured to receive a second substrate from a different one of the modules. Moreover, the wafer cassette is incapable of receiving wafers from different modules as all of the wafers are to be delivered to the same module. Thus, Takano fails to anticipate claim 1 as amended. Claims 3 and 4 are allowable over Takano for at least the same reasons. Applicants would also like to point out that added claim 12 further provides features that Takano fails to disclose.

### Claim Rejections Under 35 U.S.C. § 103(a)

Claims 6 – 7 and 9 – 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,244,811 to Takano in view of U.S. Patent No. 6,244,811 to Kroeker et al. In particular, claim 6 has been amended to include the feature of having a first and second substrate support, the first and second substrate supports configured to support substrates having different processing states, the

substrates being received from corresponding transfer modules. As mentioned above, Takano deals with a cassette holder and does not disclose a first and second substrate support receiving substrates having different processing states from the corresponding modules. None of the other references cited by the Examiner cure the deficiencies of Takano. Applicants further submit that in order to modify Takano to cover the above amendments, Takano a major redesign of Takano would be required and Takano would be modified from its intended purpose. Claims 7 and 9-11 are allowable over the references cited by the Examiner for at least these reasons. Claim 8 depends from claims 7 and is likewise allowable for the above stated reasons. Claims 2 and 5 depend from claim 1 and allowable over the cited reasons for at least the above stated reasons. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection.

Applicants respectfully request a Notice of Allowance based on the foregoing remarks. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6921. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. LAM2P324A). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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